Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of)	
)	MB Docket No. 13-249
Revitalization of the AM Radio Service)	

TO: The Commission

MOTION FOR EXTENSION OF TIME

Prometheus Radio Project ("Prometheus") respectfully requests a 14-day extension of time of the deadline to file its reply to oppositions to its Petition for Reconsideration filed in the above-captioned docket. Prometheus asks that the reply be due on June 13, 2017.

Prometheus filed its Petition for Reconsideration on April 10, 2017.¹ Notice of the Petition for Reconsideration was published in the Federal Register on May 4, 2017.² Accordingly, oppositions to the Petition for Reconsideration are due May 19, and the deadline for replies is currently May 30, 2017. Prometheus anticipates that there will be multiple oppositions filed to which it will need to reply. A leading practitioner recently observed that because "many AM stations with FM translators have already filed applications relying on the new rules, there are bound to be oppositions to this petition." Counsel for Prometheus are engaged in several active proceedings, one of which involves time sensitive issues arising from a

¹ Petition for Reconsideration of Prometheus Radio Project, MB Docket No. 13-249 (Apr. 10, 2017).

² 82 FR 20861 (May 4, 2017).

³ David Oxenford, *Update: Comment Dates Set on Prometheus Petition for Reconsideration of Relaxation of Siting Rules for FM Translators Rebroadcasting AM Stations*, BROADCAST LAW BLOG, May 5, 2017,

http://www.broadcastlawblog.com/2017/05/articles/update-comment-dates-set-on-prometheus-petition-for-reconsideration-of-relaxation-of-siting-rules-for-fm-translators-rebroadcasting-amstations/.

stay request, that will require them to submit other pleadings during this period. This proceeding involves many technical and engineering issues, so additional time would also afford counsel adequate opportunity to consult with Prometheus' technical experts. Moreover, the Memorial Day weekend falls during the current 10-day reply window, limiting the availability of support staff. Thus, a brief extension will enable Prometheus to fully address the issues raised in oppositions to its Petition for Reconsideration in a manner which can assist the Commission in the resolution of this matter.

Wherefore, Prometheus asks that the Commission extend the filing deadline for replies in this proceeding until June 13, 2017 and grant all such other relief as may be just and proper.

Respectfully submitted,

/s/ Andrew Jay Schwartzman

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May 11, 2017

2